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10 Attorneys for Defendant
11 AMERICAN AIRLINES, INC.

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16 EDWARD E. ANDERSON,

17 Plaintiff,

18 v.

19 AMR The parent of AMERICAN
20 AIRLINES INC, AMERICAN AIRLINES,
21 and DOES 1 through 5 INCLUSIVE,

22 Defendants.

10 07 3527
(San Francisco Superior Court Case No.
CGC07-459441)

**DECLARATION OF DIANE DILDY IN
SUPPORT OF DEFENDANT AMERICAN
AIRLINES, INC.'S NOTICE TO FEDERAL
COURT OF REMOVAL OF CIVIL
ACTION FROM STATE COURT
PURSUANT TO 28 U.S.C. SECTIONS 28
U.S.C. SECTIONS 1332(A)(2); 1441; AND
1446**

Diversity Jurisdiction

Complaint filed: January 9, 2007

26 I, Diane Dildy, declare as follows:

27 1. I am employed by American Airlines, Inc. (hereinafter "American Airlines") as a
28 Senior Paralegal in Ft. Worth, Texas. I have personal knowledge, or knowledge based upon

FIRMWIDE:82720352.1 009001.1303

DECLARATION OF DIANE DILDY ISO NOTICE OF REMOVAL OF CIVIL ACTION

1 corporate records and information which I have obtained and reviewed in the course of my duties, of
 2 the information hereafter set forth. I am informed and believe that the corporate records I obtained
 3 and reviewed are maintained in the regular course of business and entries are made in the records at
 4 or near the time of the transactions shown. If called and sworn as a witness, I could and would
 5 competently testify thereto.

6 2. American Airlines is incorporated in the State of Delaware and its principal place of
 7 business is located in Fort Worth, Texas. I am informed and believe that American Airlines
 8 maintains its largest and busiest hub at the Dallas/Ft. Worth International Airport, in Texas, where it
 9 employs 22,441 employees. The next largest hub is located at Miami Airport, in Miami, Florida,
 10 where it employs 8,847 employees. American Airlines' next largest hub is located at Chicago's
 11 O'Hare Airport, in Illinois, where it employs 7,898 employees. The total number of employees
 12 employed by American Airlines in the entire State of California is 7,149.

13 3. I am informed and believe that a compilation of American Airlines' annual departures
 14 and relative ranking by state¹ revealed the following for the calendar year 2006: The state with the
 15 greatest number of estimated American Airlines annual flight departures was Texas with 216,204.
 16 The state with the second highest number of estimated annual departures was Florida with 104,784.
 17 the next closest ranking state was Illinois with 89,280 departures. California had an estimated
 18 74,904 departures.

19 4. Based on a compilation of data obtained from corporate records that I reviewed, I am
 20 informed and believe that Defendant American Airlines' physical operations includes the following
 21 square footage: over 8.4 million square feet in the State of Texas;² over 6.35 million square feet in
 22 the State of Illinois; over 3.25 million square feet in the State of Florida. American Airlines'
 23 physical operations in the State of California includes slightly over 2.82 million square feet.

24
 25 ¹ Departure data for American Airlines domestic flights was compiled by reviewing the flight departure date
 26 for the month of July 2006, which was selected as representative of heavy flight volume during the summer
 27 months. The number of departures by state in July 2006 was then multiplied by 12 months to give an
 28 estimate of the (a) number of annual departures, and (b) a relative ranking of departures by state.

² This figure includes American Airlines' six story corporate headquarters buildings and other building
 complexes that house not only the corporation's executive, corporate and administrative offices, but also the
 corporation's flight academy, training center, flight museum, meeting and conference space. This figure also
 includes approximately 245,000 square feet of vacant land.

5. Based on a compilation of corporate data that I obtained and reviewed, I am informed and believe that Defendant American Airlines maintains five Reservations Centers, each of which handle the reservations in the region in which they are located. They are located as follows: Fort Worth, Texas, with 2,242 employees; Cary, North Carolina, with 1,023 employees; Windsor, Connecticut, with 477 employees; Cincinnati, Ohio, with 485 employees; and Tucson, Arizona, with 928 employees. There are no Reservation Centers in California.

6. American Airlines maintains its executive and administrative headquarters in Fort Worth, Texas. American Airlines' executive offices are there, as well as the Training Department, the Medical Department, the Flight Department, the Legal Department, Human Resources and administrative offices.

7. AMR Corporation is incorporated in the State of Delaware and its principal place of business is located in Fort Worth, Texas. I am informed and believe that AMR Corporation does not employ any employees and that all of its operations are conducted in the State of Texas.

8. During the entire course of his employment with Defendant American Airlines, Plaintiff Edward E. Anderson was employed in and worked for American Airlines in the State of California at its San Francisco Station. Plaintiff's last known residence address is located in San Leandro, California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated this 2nd day of July, 2007 at Fort Worth, Texas.

Diane Dildy
Diane Dildy